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*Attorneys for the United States*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America

vs.

James B. Panther, Jr.,  
a/k/a “James Suqui” and “James  
Suquilanda,” and

Defendant.

Case No. CR-19-00448-PHX-DLR-2

**JOINT MOTION TO CONTINUE  
TRIAL AND FOR A RULE 11 PLEA  
HEARING**

The undersigned parties, by their respective attorneys, hereby submit this Motion to Continue the Trial and set a Rule 11 Plea Hearing and an accompanying proposed order for the Court’s consideration.

On May 4, 2020, the parties notified the Court of the defendant’s intent to enter a plea of guilty. On consent of the parties, the Court referred the case to the U.S. Magistrate Judge to set a Rule 11 plea hearing. Due to the COVID-19 pandemic, the earliest date for the change of plea hearing occurs after the current trial date of June 16, 2020. Accordingly, the parties respectfully request that this Court continue the trial date and set the case for a Rule 11 plea hearing.

The parties further requests that this Court exclude the period of time from June 16,

2020 to the Rule 11 plea hearing from the Speedy Trial Act calculus pursuant to 18 U.S.C.  
§ 3161(h)(1)(G)) and (h)(7).

Respectfully submitted,

FOR PLAINTIFF  
UNITED STATES OF AMERICA

FOR DEFENDANT  
JAMES B. PANTHER, JR.

By: s/Tracee Plowell  
Tracee Plowell, Sr. Litigation Counsel  
Michelle Pascucci, Trial Attorney

By: s/Dennis Burke  
Dennis Burke, Esq.  
Mark Kokanovitch, Esq.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on May 11, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send notification to counsel of record.

Respectfully submitted,

BY: /s/ Tracee Plowell